

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

DIAMOND SPORTS GROUP, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-90116 (CML)
)
) (Jointly Administered)
)

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO
DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE
DEBTORS TO PAY A DEPOSIT IN CONNECTION WITH AN INSURANCE POLICY
AND (II) GRANTING RELATED RELIEF**

[Related to Docket No. 2311]

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, effective October 18, 2023 (the “Complex Case Procedures”), and the *Order Granting Complex Chapter 11 Bankruptcy Case Treatment* [Docket No. 41], the undersigned hereby certifies as follows:

1. On August 14, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Pay a Deposit in Connection with an Insurance Policy and (II) Granting Related Relief* [Docket No. 2311] (the “Motion”).

2. The deadline for receipt of objections to the Motion has passed.

3. In accordance with paragraph 44 of the Complex Case Procedures, the undersigned represents to the Court that the Debtors are not aware of any objection to the Motion and that counsel has reviewed the Court’s docket and no objection/response appears thereon.

4. Attached hereto is the proposed *Order (I) Authorizing the Debtors to Pay a Deposit*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors’ service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

in Connection with an Insurance Policy and (II) Granting Related Relief, originally filed with the Motion at Docket No. 2311-1 (the “Proposed Order”).

5. The Debtors respectfully request that the Court enter the Proposed Order.

September 5, 2024

Respectfully submitted,

/s/ John F. Higgins

PORTER HEDGES LLP

John F. Higgins (TX Bar No. 09597500)

M. Shane Johnson (TX Bar No. 24083263)

Megan Young-John (TX Bar No. 24088700)

Bryan L. Rochelle (TX Bar No. 24107979)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jhiggins@porterhedges.com

sjohnson@porterhedges.com

myoung-john@porterhedges.com

brochelle@porterhedges.com

- and -

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

Brian S. Hermann (admitted *pro hac vice*)

Andrew M. Parlen (admitted *pro hac vice*)

Joseph M. Graham (admitted *pro hac vice*)

Alice Nofzinger (admitted *pro hac vice*)

1285 Avenue of the Americas

New York, New York 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

bhermann@paulweiss.com

aparlen@paulweiss.com

jgraham@paulweiss.com

anofzinger@paulweiss.com

*Counsel to the Debtors and Debtors in
Possession*

Certificate of Service

I certify that on September 5, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins